

ORIGINAL

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6 *Exempt From Filing Fees Pursuant to Gov't Code § 6103*

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER

SEP 18 2018

DAVID H. YAMASAKI, Clerk of the Court

BY: M. RAHN, DEPUTY

8 SUPERIOR COURT OF CALIFORNIA

9 COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

OFFICE OF THE COUNTY COUNSEL

11 PEOPLE OF THE STATE OF CALIFORNIA,) Case No. 15CF1451
12 Plaintiff,) DECLARATION OF INVESTIGATOR
13 v.) NAOMI HERNANDEZ
14 TELONIOUS TAYLOR,) Dept: C5
15 Defendant.)
16)
17)
18)

19 I, Naomi Hernandez, declare as follows:

- 20 1. I am over the age of 18 years. I have personal knowledge of the facts stated in this
declaration, unless the facts are stated on information and belief, in which case I believe them to
be true. If called to testify, I could and would competently testify to the facts contained herein.
- 21 2. I am an Investigator in the Orange County Sheriff-Coroner Department ("Sheriff").
- 22 3. More than 100 recordings ("Recordings") of the Defendant Telonious Taylor's
("Defendant") telephone calls from the Orange County Jail were downloaded in December 2016
and located on my external hard drive. One of those calls was identified as potentially
containing attorney-client privileged information.
- 23 4. I am informed and believe that a copy of these Recordings was lodged with the Court in

Department C5 on Thursday, September 3, 2018.

5. I then deleted these Recordings from my external hard drive. I am informed and believe that I no longer have the Recordings.

6. I am informed and believe that I was the only person with the Recordings at the Sheriff.

7. I am informed and believe that the Sheriff's vendor Global*Tel Link Corporation has the original Recordings. The Sheriff does not have access to the recording that potentially contained attorney-client privileged information.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 18th day of September 2018, at Santa Ana, California.

W. N. Hernandez 1985

Investigator Naomi Hernandez

1
PROOF OF SERVICE

2 I do hereby declare that I am a citizen of the United States employed in the County of Orange,
3 over 18 years old and that my business address is 10 Civic Center Plaza, 4th Floor, Santa Ana, California
92701. I am not a party to the within action.

4 On September 18, 2018, I served the foregoing **DECLARATION OF INVESTIGATOR**
5 **NAOMI HERNANDEZ** on all other parties to this action by placing a true copy of said document in a
sealed envelope in the following manner:

6 [X] (BY U.S. MAIL) I placed such envelope(s) addressed as shown below for collection and mailing
7 at Santa Ana, California, following our ordinary business practices. I am readily familiar with this
8 office's practice for collecting and processing correspondence for mailing. On the same day that
correspondence is placed for collection and mailing, it is deposited in the ordinary course of business
with the United States Postal Service in a sealed envelope with postage fully prepaid.

9 [] (BY OVERNIGHT DELIVERY) I placed such envelope(s) addressed as shown below for
10 collection and delivery with delivery fees paid or provided for in accordance with this office's practice.
I am readily familiar with this office's practice for processing correspondence for delivery the following
11 day by overnight delivery.

12 [] (BY FACSIMILE) I caused such document to be telefaxed to the addressee(s) and number(s)
shown below, wherein such telefax is transmitted that same day in the ordinary course of business.

13 [] (BY PERSONAL SERVICE) I caused such envelope(s) to be hand-delivered to the addressee(s)
14 shown below.

15 [X] (STATE) I declare under penalty of perjury under the laws of the State of California that
the foregoing is true and correct.

16 [] (FEDERAL) I declare that I am employed in the office of a member of the Bar of this
17 Court at whose direction the service was made.

18 Dated: September 18, 2018


Anna Z. Strahan

19

20 NAME AND ADDRESS TO WHOM SERVICE WAS MADE

21
22 Maltaise Cini, Conflict Attorney
Law Offices of Maltaise Cini
23 1300 Bristol St. N. Suite 100
Newport Beach, CA 92660

24
Attorney for Defendant, Telonious Taylor

25 Denise Hernandez, Deputy District Attorney
Office of the District Attorney
26 County of Orange
OCSC - Central Justice Center
27 401 Civic Center Drive West
Santa Ana, California 92701

28
Attorney for Plaintiff, People of the State of
California